

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**TAMELA WINGARD,
Plaintiff,**

vs.

**U.S. UNWIRED, INC.,
Defendant.**

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CASE NUMBER: 2:06-cv-604-WKW-VPM

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on August 17, 2006, by telephone, and was attended by:
 - a. Jay Lewis, Law Offices of Jay Lewis, LLC, attorney for Plaintiff Tamela Wingard; and
 - b. Fern H. Singer, Jennifer Swain, Baker Donelson Bearman Caldwell & Berkowitz, PC, attorney for defendant U.S. Unwired
2. Pre-Discovery Disclosures. The parties will exchange by September 8, 2006 the information required by Fed.R.Civ.P. 26(a)(1).
3. Discovery Plan. The parties jointly propose to the Court the following discovery plan: Discovery will be needed on the following subjects:
 - a. information relating to plaintiff's complaint;
 - b. defendant's defenses and damages.

All discovery commenced in time to be completed by April 30, 2006.

Maximum of 25 interrogatories by each party to any other party; maximum of 25 requests for production (including sub-parts) by each party to any other party. Responses due 30 days after service.

Maximum of two sets of requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of five depositions by plaintiff and by defendant. Responses due 30 days after service.

Each deposition, other than of plaintiff, limited to maximum of six hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

From Plaintiff by January 15, 2007;

From Defendant by February 15, 2007.

Supplementations under Rule 26(e) due as soon as possible but no later than April 15, 2007.

4. Other Items.

- a. The parties do not request a conference with the Court before entry of the Scheduling Order.
- b. The parties request a Pretrial Conference in June, 2007.
- c. Plaintiff should be allowed until February 1, 2007 to join additional parties and to amend the pleadings.
- d. Defendant should be allowed until February 15, 2007 to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed by March 30, 2007.
- f. Settlement may be enhanced by use of a settlement conference.
- g. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:
 - i. From Plaintiff by June 8, 2007
 - ii. From Defendant by June 22, 2007
- h. Parties should have 15 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- i. This case should be ready for trial July 9, 2007 and at this time is expected to take approximately three days to try, exclusive of jury selection.

DATED: August 17, 2006.

/s/JAY LEWIS
Jay Lewis
Attorney for Plaintiff

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